



RON CHAPMAN, MD, MPH
Director & State Health Officer

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

September 5, 2013

Certified Mail
7011 2000 0001 1428 7297

Klamath National Forest
Supervisor's Office
1711 South Main St.
Yreka, CA 96097

Attention: Ken Stagg, Forest Engineer

CITATION NO. 01-01-13C-007

Enclosed is a citation for violation of the coliform maximum contaminant level at the Callahan Work Center public water system in May 2013. The citation specifies action to be taken by Callahan Work Center to achieve compliance and avoid future civil penalties.

The citation requires an investigation into the cause of the coliform problem. On August 8, 2013, Barry Sutter, of this office, made an inspection of the Callahan Work Center water system. He identified a number of potential deficiencies, some of which may have contributed to the past coliform problem or may contribute to a future problem. He sent to you, via e-mail on August 16th, a list of the deficiencies with pictures. Your investigation should include review of these items.

Section 116577 of the California Safe Drinking Water Act provides for our department to be reimbursed by the public water system for costs incurred for preparing and issuing an enforcement action to that system. Therefore, your water system will be billed for the preparation and issuance of this citation. Our costs are approximately \$126 per hour. At this time we have spent approximately 1.2 hours on enforcement activities associated with this violation. You will receive a bill for these costs in August 2014, following the end of the State's fiscal year, from our Fee Billing Unit in Sacramento.

Should you have any questions, please contact me at (530) 224-4872 or Barry Sutter at (530) 224-4875.

Tony Wiedemann, P.E.
Klamath District Engineer
DRINKING WATER FIELD
OPERATIONS BRANCH

Enclosure

cc: Richard Hinrichs, Chief – DDW – Northern California Section

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

Name of Public Water System: Callahan Work Center

Water System No: 4700850

To: Klamath National Forest
1711 South Main Street
Yreka, CA 96097

Issued: September 5, 2013
Via Certified Mail

CITATION FOR NONCOMPLIANCE

With Title 22 of the California Code of Regulations Section 64426.1

Section 116650 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit or order issued thereunder.

The Division of Drinking Water and Environmental Management of the State of California Department of Public Health (Department) hereby issues a citation to the Callahan Work Center for failure to comply with Title 22, California Code of Regulations (CCR) Section 64426.1.



APPLICABLE AUTHORITIES

Section 116650 of the CHSC states in relevant part:

- (a) If the department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).
- (e) The department may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.

California Code of Regulations (CCR), Section 64426.1 states in relevant part:

- (b) A public water system is in violation of the total coliform MCL {maximum contaminant level} when any of the following occurs:



1 (1) For a public water system which collects at least 40 samples per month, more
2 than 5.0 percent of the samples collected during any month are total coliform-
3 positive; or

4 (2) For a public water system which collects fewer than 40 samples per month, more
5 than one sample collected during any month is total coliform-positive; or

6 (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or

7 (4) Any repeat sample following a fecal coliform-positive or E. coli-positive routine
8 sample is total coliform-positive.

9 (c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any
10 month in which it supplies water to the public, the water supplier shall notify the
11 Department by the end of the business day on which this is determined, unless the
12 determination occurs after the Department office is closed, in which case the supplier shall
13 notify the Department within 24 hours of the determination. The water supplier shall also
14 notify the consumers served by the water system. A Tier 2 Public Notice shall be given for
15 violations of paragraphs (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice
16 shall be given for violations of paragraphs (b)(3) or (4), pursuant to section 64463.1.

17 STATEMENT OF FACTS

18
19 The Department has received laboratory results for six bacteriological samples
20 collected during May 2013 from Callahan Work Center. All samples were analyzed
21 for the presence of coliform bacteria. Three of the six samples tested positive for
22 coliform bacteria.

23
24 Repeat sample results were not received until August 2013 and Callahan Work
25 Center did not notify the Department pursuant to Section 64426.1(c).



DETERMINATIONS

The Department has determined that Callahan Work Center violated Section 64426.1, Title 22, of the CCR in that Callahan Work Center failed to comply with the maximum contaminant level (MCL) for total coliform bacteria during the month of May 2013.

DIRECTIVES

Callahan Work Center (Water System) is hereby directed to take the following actions:

1. Comply with Section 64426.1 in all future monitoring periods.
2. By **September 17, 2013**, notify all persons served by the Water System of the MCL violation. Notification must be completed in accordance with each of the following:
 - a) Complete the enclosed notice *"IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER"* to include the name, address, and telephone number of a Water System representative as a source of additional information concerning the public notice. Also, in the space provided, you must give a legible, written description (preferably typed) of the corrective actions taken by the Water System to prevent this violation from occurring in the future. At the bottom, provide the date or dates the notice was distributed.
 - b) Distribute the notice to the users in accordance with Section 64463.4(c)(2), Title 22, CCR, by:
 - 1) Posting in conspicuous locations throughout the area served by the Water System for at least seven days;



1 2). And by one or more of the following methods to reach persons not
2 likely to be reached by public posting;

- 3 • Publication in a local newspaper or newsletter distributed to
- 4 customers;
- 5 • E-mail message to employees or students;
- 6 • Posting on the Internet or intranet; or
- 7 • Direct delivery to each customer.

8 3. A representative of the Water System shall complete the enclosed
9 "Certification of Public Notice" form and return it to the Department by
10 **September 27, 2013**. A copy of the notice that was distributed must be
11 included with the form.

12 4. Pursuant to Section 64424(d), Title 22 of the CCR, the Water System shall
13 collect five (5) routine bacteriological samples in **September 2013**.

14 5. The Water System shall conduct an investigation into the cause of the
15 positive bacteriological samples. By **September 27, 2013**, the Water System
16 shall advise the Department in writing of the findings of this investigation and
17 any corrective actions taken. The following items should be investigated, as
18 applicable:

- 19 a) Condition of the well(s), pressure tank(s), storage tank(s), treatment
- 20 system(s), and distribution system
- 21 b) Deviations from normal operating procedures and interruptions in the
- 22 treatment process
- 23 c) System pressure loss to less than 5 psi
- 24 d) Potential cross-connections
- 25 e) Physical evidence indicating potential contamination of facilities.
- 26 Examples are holes or openings in the well casing, damaged or missing
- 27



1 screens on the storage tanks, evidence of animal activity or vandalism
2 around the well, storage tank, or treatment facilities.

- 3 f) Reports of suspected waterborne illnesses from the users
4 g) Construction or repair work on the water system pipelines or facilities,
5 especially work done without adequate disinfection
6 h) Inadequately trained samplers or sampler error

7 The Department reserves the right to make such modifications to this citation as it
8 may deem necessary to protect public health and safety. Such modifications may be
9 issued as amendments to this citation and shall be effective upon issuance.

10
11 Nothing in this citation relieves the Water System of its obligation to meet the
12 requirements of the California Safe Drinking Water Act (CHSC, Division 104, Part 12,
13 Chapter 4, commencing with Section 116270), or any regulation, standard, permit or
14 order issued thereunder.

15
16 All submittals required by this citation shall be submitted to the Department at the
17 following address:

18 Tony Wiedemann, P.E.
19 California Department of Public Health
20 Drinking Water Field Operations Branch
21 364 Knollcrest Drive, Suite 101
22 Redding, CA 96002

23 **PARTIES BOUND**

24 This citation shall apply to and be binding upon the Water System, its officers,
25 directors, agents, employees, contractors, successors, and assignees.
26
27



SEVERABILITY

The directives of this citation are severable, and the Water System shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

FURTHER ENFORCEMENT ACTION

Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the California Health and Safety Code authorizes the Department to: issue additional citations with assessment of penalties if a public water system continues to fail to correct a violation identified in a citation; take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with orders of the Department; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the Department. The Department does not waive any further enforcement action by issuance of this citation.

Tony Wiedemann

Tony Wiedemann, P.E.
District Engineer
Klamath District
Drinking Water Field Operations Branch

Sept. 5, 2013
Date

Attachments:

Notice - Important Information About Your Drinking Water
Certification of Public Notice

Certified Mail No. 7011 2000 0001 1428 7297



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.

Tradúzcalo o hable con alguien que lo entienda bien.

State Coliform Standard Not Met for Callahan Work Center – May 2013

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we did to correct this situation.

We routinely monitor for drinking water contaminants. In May 2013, a routine water sample showed the presence of coliform bacteria. Subsequent follow-up samples were taken which confirmed the presence of coliform bacteria in the water. The standard is that no more than one sample per month may show the presence of coliform bacteria.

What should you do?

You do not need to boil your water or take other corrective actions.

This is not an emergency. If it had been, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves. *Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.*

Usually, coliform are a sign that there could be a problem with our treatment or distribution system (pipes). Whenever we detect coliform bacteria in any sample, we do follow-up testing and check for the presence of other bacteria of greater concern, such as fecal coliform or *E. coli*. **We did NOT find any fecal coliform or *E. coli* bacteria in our subsequent testing, and further testing shows that this problem has been resolved.**

People with severely compromised immune systems, infants, and some elderly may be at increased risk. These people should seek advice about drinking water from their health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1 (800) 426-4791.

If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

What Happened? What Was Done?

Persons wishing more information should contact:

(name)

(address)

(phone number)

Please share this information with other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date(s) distributed: _____

Certification of Public Notice
(Noncommunity)

This form when completed and returned to the Division of Drinking Water and Environmental Management (364 Knollcrest Drive, Suite 101, Redding, CA 96002 or fax to 530-224-4844), serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463 – 64465.

Public Water System Name Callahan Work Center

Public Water System No. 4700850

Public notification for the May 2013 coliform MCL failure was performed by the following method(s) (check and complete those that apply):

☐ The notice was posted in the following conspicuous places:
A copy of the notice is attached.

Provide the date (or dates) that the notice was posted _____
(date)

☐ The notice was published in a local newspaper or newsletter on _____
A copy of the newspaper or newsletter notice is attached. (date)

☐ The notice was e-mailed to employees or students on _____
A copy of the notice is attached. (date)

☐ The notice was posted on the Internet or intranet on _____
A copy of the notice is attached. (date)

☐ The notice was directly delivered to each customer on _____
A copy of the notice is attached. (date)

I hereby certify that the above information is factual.

Printed Name

Signature

Date